

FREEMAN, NOOTER & GINSBERG
ATTORNEYS AT LAW

LOUIS M. FREEMAN
THOMAS H. NOOTER*
LEE A. GINSBERG

*NY AND CALIF. BARS

75 MAIDEN LANE
SUITE 503
NEW YORK, N.Y. 10038

(212) 608-0808
TELECOPIER (212) 962-9696

November 18, 2019

Hon. Paul A Engelmayer
United States District Judge
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

Letter Motion

RE: United States v. Tiffany Amponsah, 17 Cr. 631 (PAE)

Your Honor:

I was the CJA attorney who represented Ms. Amponsah in this Court, and in that capacity I am writing now with an application to the Court which relates to her conditions of supervised release. She was sentenced by this Court to Time Served and 3 years of supervised release, with a condition that she complete 300 hours of community service. She has been compliant in her reporting, and making payments toward restitution, but until recently was not doing much of the community service requirement because she is both working and enrolled in a nursing class (respiratory therapy). On May 8, 2018, due to her “positive adjustment and compliance with supervision” she was transferred to the “Low Intensity Caseload (LIC).”

The application is that she be allowed to travel to Ghana for the memorial service of her grandfather. She plans to fly on Egyptair on December 15, 2019, traveling with an older cousin and the cousin’s children. In Accra, Ghana, she will stay with relatives at 22 Laryea Ania Street, West Lagoon, in Accra, and would fly back to JFK Airport, arriving on January 8, 2020.

Normally this kind of application would be made through her Probation

Officer, but her Officer “denied” the request, stating (to me, when I inquired) that she wants Ms. Amponsah to apply directly to the Court. I believe the main objection is that Ms. Amponsah had not completed almost any hours of Community Service, but I do not want to speak for her.

Ms. Amponsah, upon being told of that, has been actively completing community service hours, even though she is working and is enrolled in a study program. She expects that by the end of November she will have completed 50 hours of the community service requirement.

I have consulted with AUSA Sebastian Swett and he has no objection to this request.

When I spoke with Ms. Amponsah’s Probation Officer, Zondra Jackson, as I stated, she said that she wanted me to make the request directly to the Court, so I do not know exactly what, if any, objection is that she has.

Thank you.

Sincerely,

s/ Thomas H. Nooter
Thomas H. Nooter
Attorney for Ms. Amponsah

cc: AUSA Sebastian Swett, by email
USPO Zondra Jackson, by email